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Attorneys for Defendant,
THE HERTZ CORPORATION

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

CARLOS ALBERTO RODRIGUES DE FREITAS as the Administrator of the Estate of Isabel Auler (deceased), CARLOS ALBERTO RODRIGUES DE FREITAS, an individual,)	Case No. 2:18-cv-01522-JAD-BNW
)	
)	
)	
Plaintiffs,)	
)	
vs.)	
)	
THE HERTZ CORPORATION, a Delaware corporation, ROBERT CHARLES STEVENS, an individual, and DOES 1-10. Inclusive,)	
)	
Defendants.)	

ORDER AND STIPULATION TO EXTEND SUPPLEMENTAL EXPERT DISCLOSURE

DEADLINE

TO THE HONORABLE COURT: THE PARTIES STIPULATE AS FOLLOWS:

WHEREAS the parties are diligently pursuing discovery in this case,

ORDER AND STIPULATION TO EXTEND SUPPLEMENTAL EXPERT DISCLOSURE

DEADLINE

WHEREAS the parties have supplied their initial disclosures and continue to make supplemental disclosures,

WHEREAS the parties have propounded numerous sets of written discovery and all parties have responded to the same,

WHEREAS a FRCP Rule 35 examination of Plaintiff Carlos De Freitas went forward with psychiatrist Manuel Saint Martin on February 3, 2022, on behalf of Defendant Hertz,

WHEREAS Defendant Hertz has retained an infections disease expert to perform a medical record review and offer opinions related to the cause of Plaintiff Auler's death,

WHEREAS Plaintiff has retained a replacement psychiatrist expert to replace Dr. Norton Roitman, who fell ill,

WHEREAS the parties need an additional two (2) weeks' time to have their experts prepare expert reports,

THEREFORE, in the circumstances, good cause exists to continue the supplemental expert deadline for two (2) weeks. The current supplemental expert disclosure deadline is February 17, 2022. The parties agree on a new supplemental expert disclosure deadline date of March 3, 2022. The parties do not wish to continue any other dates as set forth in the current Discovery Deadlines contained in (Doc #120). The current deadlines are as follows:

Item	Deadline
Complete all discovery	April 18, 2022 (no change)
Supplemental/New expert reports exchanged	February 17, 2022 (to be continued to March 3, 2022 pursuant to this Stipulation)
Prepare and file dispositive motions	April 23, 2022 (no change)

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1 IT IS HEREBY STIPULATED BETWEEN THE PARTIES AS FOLLOWS:

2 The current supplemental expert disclosure deadline is continued from February 17, 2022 to
3 March 3, 2022. The parties do not wish to continue any other dates as set forth in the current Discovery
4 Deadlines contained in (Doc #120).

5 Respectfully submitted,

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7 Dated: February 16, 2022

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9 BY: 

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15 BY: /s/Jonathan Capp

Jonathan Capp, Esq.
Attorneys for Plaintiffs

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18 **ORDER**
19 **IT IS SO ORDERED**

20 **DATED:** 4:31 pm, February 17, 2022

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22 **BRENDA WEKSLER**
23 **UNITED STATES MAGISTRATE JUDGE**